

Cc: Rothery, Deirdre[Rothery.Deirdre@epa.gov]; Gilbert, Alexas[Gilbert.Alexas@epa.gov]; Vetter, Rick[Vetter.Rick@epa.gov]; Stoneman, Chris[Stoneman.Chris@epa.gov]; Mckelvey, Laura[Mckelvey.Laura@epa.gov]; Smith, Claudia[Smith.Claudia@epa.gov]
To: Boydston, Michael[Boydston.Michael@epa.gov]; Branning, Amy[Branning.Amy@epa.gov]
From: Beeler, Cindy
Sent: Wed 11/18/2015 5:57:08 PM
Subject: Re: Transparency in Use of Tribal Minor Source Registration Data

I believe you are correct, Mike. The registration is required and the data also demonstrate compliance with applicable Fed and State law/reg re. minor source permitting. I am looping in **Claudia Smith** so she's a part of this conversation.

Here is the link (within the webpage that Mike sent below) for Existing Source Registration ...
http://www3.epa.gov/air/tribal/pdfs/existing_source_registration_rev2017.pdf

Here is the proposed new **Bundle 3: Federal Implementation Plan for Oil and Natural Gas Minor Sources and Amendments to the Federal Indian Country Minor NSR Rule, August 18, 2015** – EPA is proposing a Federal Implementation Plan rule that would apply to new true minor sources and minor modifications at existing true minor sources in the production segment of the oil and natural gas sector that are locating or expanding in Indian country. In the same action, EPA is also proposing several amendments to the Federal Indian Country Minor NSR Rule and one amendment to the Federal Indian Country Major NSR Rule.

http://www3.epa.gov/air/tribal/pdfs/new_source_registration_for_ONG.pdf ... while we're considering this CBI/emissions data for our U&O FIP TSD, perhaps we should keep in mind language to add to the proposed form to ensure clarity moving forward.

Thanks,

Cindy Beeler

US EPA Region 8, Energy Advisor
Office of the Regional Administrator
Tel: 303-312-6204
Beeler.Cindy@epa.gov

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From: Boydston, Michael
Sent: Wednesday, November 18, 2015 9:32 AM
To: Branning, Amy
Cc: Rothery, Deirdre; Gilbert, Alexas; Vetter, Rick; Beeler, Cindy; Stoneman, Chris; Mckelvey, Laura
Subject: RE: Transparency in Use of Tribal Minor Source Registration Data

Hi Amy –

Ex. 5 - Attorney Client

Please let us know what you think.

Michael Boydston

Associate Regional Counsel, EPA Region 8

303.312.7103

From: Branning, Amy
Sent: Wednesday, November 18, 2015 9:11 AM
To: Beeler, Cindy; Stoneman, Chris; Mckelvey, Laura
Cc: Boydston, Michael; Rothery, Deirdre; Gilbert, Alexas
Subject: RE: Transparency in Use of Tribal Minor Source Registration Data

Cindy:

Ex. 5 - Attorney Client

Amy Huang Branning

EPA Office of General Counsel

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From: Beeler, Cindy

Sent: Wednesday, November 18, 2015 10:42 AM

To: Stoneman, Chris <Stoneman.Chris@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>

Cc: Boydston, Michael <Boydston.Michael@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>; Gilbert, Alexas <Gilbert.Alexas@epa.gov>
Subject: Transparency in Use of Tribal Minor Source Registration Data

HQ folks -

As you know, Region 8 is underway developing rules to reduce VOC emissions from existing sources on the Uintah & Ouray Indian Reservation.

We mined data from >5,000 Tribal minor source registrations for emission data and equipment count data to do our cost analysis and calculate emission reductions that could be achieved. So throughout the draft preamble, and in the Technical Support Document, we refer to this data.

Our cost analysis and emission reduction calculations are in two separate Excel workbooks - both contain the registration details, including company and facility names, that are part of the registration data.

Ex. 5 - Attorney Client

Thanks,

Cindy Beeler

US EPA Region 8, Energy Advisor
Office of the Regional Administrator
Tel: 303-312-6204
Beeler.Cindy@epa.gov

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